

### ARGUMENT

Claims 1, 2-4, 11-40 and 44-47 remain pending in the application. New claims 48-49 have been added. Independent Claims 1 and 32, as well as dependent Claims 11, 18 and 27 have been amended.

The Examiner has objected to the drawings on several grounds. Replacement sheets with corrected drawings are submitted herewith. Additionally, the Specification has been amended accordingly to address the deficiencies identified by the Examiner with respect to the drawings. Additionally, the drawings have been corrected to comply with 37 C.F.R. 1.121(d).

The Examiner has objected to the Specification requiring that cross reference data be updated. Appropriate correction has been made by virtue of the amendment to the Specification.

With respect to the claims, the Examiner has indicated that Claims 11-30, 33-35 and 45 would be allowable if rewritten in independent form.

The Examiner has rejected both independent claims, namely Claims 1 and 32, under 35 U.S.C. 102(b) as being anticipated by Burns et al. (USP 2,097,615). Applicant traverses this rejection on the grounds that the reference does not show each and every element of the limitations set forth in Applicant's claims.

The Examiner states that in Burns, "when the clamping device is tightened the force is applied to the larger tubular member would inherently decrease the inner diameter of the tubular member to some degree." Applicant disagrees. To the extent the clamping device 11 of Burns can be equated to the clamping device of the invention, the clamping force in Burns is applied to the *inner* tubular member A by virtue of components 11 and 25. The overall casing head is secured to *outer* tubular member C with threads 14. In contrast, Applicant applies a clamping force to the outer tubular member thereby causing distortion thereof. In fact, because the casing head of Burns engages outer tubular member C utilizing threads, outer tubular member C is clearly not distorted when the casing head engages the threaded end of outer tubular member C, nor could it be without damaging the threaded connection therebetween.

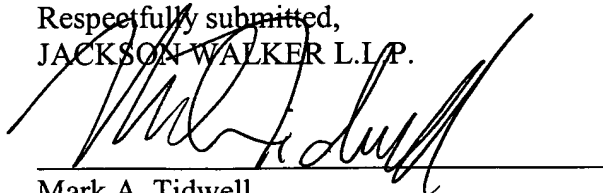
None of the Figures of Burns illustrate any instance where a radial inward clamping force is applied to outer tubular member C. One novel aspect of Applicant's invention, on the other hand, is to utilize a clamping device and peripheral member to generate such a clamping force in order to distort the outer tubular member so as to cause a restriction in the inner circumference of the outer tubular member. Since Burns (i) clamps the inner tubular member and (ii) can't clamp the outer tubular member without damaging the threaded connection, the teachings of Burns and the claimed invention of the Applicant are not the same and, in fact, are contrary to one another. In this regard, Burns does not teach each and every element of Claim 1 or each and every step of Claim 32.

Applicant amended the claims to clarify the structure of the invention and to clarify the functions of the claimed invention. However, amendments have not been made to narrow the claims of the original application but, rather simply, to clarify claims due to grammar that the Examiner found unclear.

Based on the foregoing, the Examiner is respectfully requested to withdraw the rejections of independent Claims 1 and 32 and pass these claims to allowance. Likewise, since each independent claim is allowable, the Examiner is respectfully requested to pass all dependent claims to allowance as well.

If the Examiner feels that a telephone conference with the undersigned would be helpful to the allowance of this application, a telephone conference is respectfully requested.

Respectfully submitted,  
JACKSON WALKER L.L.P.



Mark A. Tidwell  
Reg. No. 37,456  
112 E. Pecan Street, Suite 2100  
San Antonio, Texas 78205-1521  
Phone: (713) 752-4578  
Fax: (713) 752-4221  
Attorneys for Applicant

In re Patent Application of  
VanBilderbeek, B.H.

Serial No. 10/721,443



CERTIFICATE OF MAILING

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited on the date shown below with the United States Postal Service, with sufficient postage as First Class Mail (37 CFR 1.8(a)), in an envelope addressed to Mail Stop Response/FEE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA, 22313-1450.

Date: April 25, 2005

  
\_\_\_\_\_  
Renee Treider

3898735v.1